

Before the
COPYRIGHT ROYALTY JUDGES
Washington, DC

_____)	
<i>In re</i>)	
)	
DISTRIBUTION OF)	NO. 16-CRB-0009-CD (2014-17)
CABLE ROYALTY FUNDS)	
_____)	

JOINT OPPOSITION OF THE ALLOCATION PHASE PARTIES
TO DAVID POWELL’S SEPTEMBER 11, 2019 MOTION

The undersigned representatives of the Allocation Phase claimant categories to which Section 111 cable royalties have been allocated in prior distribution proceedings (“Allocation Phase Parties”) submit the following opposition to the “Verified Motion to be sent Royalty Repayment Agreement w/ name added to agreement blank form as a designated agent recipient claimant sua sponte,” (the “Motion”) filed by *pro se* claimant David Powell on September 11, 2019.

As an initial matter, to the extent that the Motion opposes the partial distribution of the 2017 cable royalty funds, it is untimely; the comment period for this partial distribution ended on May 10, 2019. *See* Distribution of Cable Royalty Funds, 84 Fed. Reg. 14420 (April 10, 2019). In addition, the Motion does not make a coherent request for relief. But what is clear is that the Motion presents no basis for revisiting the Judges’ prior approval of the partial distribution of the 2017 royalty funds to the Allocation Parties. *See Order Granting Motion for Partial Distribution*, Docket No. 16-CRB-0009-CD (2014-17) (May 22, 2019); *Order Denying Powell Motion to be Added to Repayment Agreement*, Docket No. 16-CRB-0010-SD (2014-17) (Sept. 19, 2019). Accordingly, the Motion should be denied.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of September, 2019, a copy of the foregoing Joint Opposition of the Allocation Phase Claimants to David Powell's September 11, 2019 Motion was filed electronically using eCRB, which will automatically provide electronic service copies to all counsel of record who are registered to use eCRB. *See* 37 C.F.R. § 303.6(h)(1).

/s/ Michael Kientzle

Michael Kientzle

Proof of Delivery

I hereby certify that on Wednesday, September 25, 2019, I provided a true and correct copy of the Joint Opposition of the Allocation Phase Parties to David Powell's September 11, 2019 Motion to the following:

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